

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
BERNADETTE C RAINES,	:	
	:	Case No. 23-11627-PMM
Debtor.	:	

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

DIANE G. MORRIS ("Creditor"), by and through her undersigned counsel, hereby submits this Response to the Motion of Bernadette C. Raines (the "Movant") for Motion to Partially Avoid Lien (the "Motion"), and in support thereof respectfully states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part; Denied in part. It is admitted that per the Debtor's schedules the property is valued at \$145,620.00. It is denied that \$145,620.00 is the true value. It is believed that the value is about \$50,000.00 more base upon recent sales in the debtor's neighborhood. See exhibit "A"
5. Admitted
6. Admitted.
7. Admitted.
8. Admitted
9. Admitted.
10. Admitted
11. Admitted.
12. Admitted.
13. Admitted.

14. Admitted.

15. Admitted.

Respectfully submitted,

/s/ Lopez Thompson

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Counsel to the Diane G. Morris

Dated: November 2nd , 2023
